



May 20th, 2007

Virginia Department of Environmental Quality
Monica Harvey
East Main Street,
P.O. Box 1105
Richmond, VA 23218

Re: Comments on the three draft State Operating Permits for the control of SO₂ from the Mirant Potomac River Generating Station.

Dear Members of the Virginia State Air Pollution Control Board:

The Sierra Club wishes to submit the following comments regarding the State Operating Permits for the control of SO₂ from the Mirant Potomac River Generating Station.

The use of intermittent controls based on daily predictive modeling is prohibited by federal and state regulations. For this reason options 2 and 3 are not acceptable under any circumstances.

Option 1 is unacceptable in that it only addresses one criteria pollutant.

The Sierra Club supports a comprehensive state operating permit to be issued as soon as possible that is fully protective of the NAAQS for all criteria pollutants, including fine particles or PM_{2.5} under all circumstances. Emission limits should be determined using an unmodified EPA air quality model (or models) that have been fully evaluated for regulatory applications.

The Stack-Merge project is a prohibited dispersion technique under federal and state regulations that is contrary to the interest of protecting public health and the environment in the D.C metro area. The project essentially moves primary pollutants from one densely populated part of the metro area to other communities downwind. In addition, ozone and secondary PM_{2.5} formation from Mirant's NO_x and SO₂ emissions downwind, in the DC metro area and up to hundreds of kilometers from the plant would further aggravate attainment in those areas. For all these reasons we oppose the Stack Merge Project.

The Potomac River Generating Station will no longer be needed for electrical reliability after June 2007 and there are plenty other alternatives for electricity generation without

continued health risks to residents of Alexandria and the District of Columbia. Given Mirant's continued history of state and federal clean air violations and its location in a densely populated urban area it is our position that this ancient facility must be phased out as soon as possible.

Sincerely,

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